

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio



JUDGE HELMICK

Northern Division

Austin Crist

Case No.

3:25 CV 578

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jason Stiverson, Hillsdale county Jail and Magan
Siverson

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

FILED

MAR 24 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

receipt # 14952

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Austin Crist
Street Address	514 south Platt st.
City and County	Montpelier, Williams
State and Zip Code	Ohio, 43543
Telephone Number	419-212-8810
E-mail Address	austinaustin514@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name	Jason Stiverson
Job or Title (if known)	Hillsdale Jail Capton
Street Address	165 W Fayette St
City and County	Hillsdale, Hillsdale
State and Zip Code	Michigan, 49242
Telephone Number	(517) 437-7317
E-mail Address (if known)	j.stiverson@co.hillsdale.mi.us

Defendant No. 2

Name	Hillsdale County Jail
Job or Title (if known)	N/A
Street Address	165 W Fayette Street
City and County	Hillsdale, Hillsdale
State and Zip Code	Michigan, 49242
Telephone Number	517-437-7317
E-mail Address (if known)	j.stiverson@co.hillsdale.mi.us

Defendant No. 3

Name	Megan Stiverson
Job or Title (if known)	Hillsdale jail Judge
Street Address	49 N. Howell St
City and County	Hillsdale, Hillsdale
State and Zip Code	Michigan, 49242
Telephone Number	(517) 437-2908
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C.1983 ,1st, 5th, 8th and 14th Amendment Violations, HIPAA violation and Title 28 U.S.C. § 455 Violations.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Austin Crist, is a citizen of the State of *(name)* Ohio.

b. If the plaintiff is a corporation

The plaintiff, *(name)* N/A, is incorporated under the laws of the State of *(name)* N/A, and has its principal place of business in the State of *(name)* N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Jason Stiverson, is a citizen of the State of *(name)* Michigan. Or is a citizen of *(foreign nation)* N/A.

b. If the defendant is a corporation

The defendant, *(name)* Jason Stiverson, is incorporated under the laws of the State of *(name)* Michagan, and has its principal place of business in the State of *(name)* Michigan.
 Or is incorporated under the laws of *(foreign nation)* N/A, and has its principal place of business in *(name)* N/A.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

A great amount of pain and suffering and possibly permanent damage was inflicted on me. Due to gross negligence, medical malpractice and police misconduct, the defendants are responsible for me not getting proper medical attention due to the crimes they committed, and I went through torture in jail custody, including oxygen torture in a modified restraint chair designed for simulated waterboarding. All together, that makes \$3,000,000 a resonable amonut.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Count #1 5th, 8th and 14th Amendment Violations

1 I experienced a medical emergency in public on April 20, 2023, four days after an abduction from my home.

2. Due to partial seizure-induced memory loss and associated vision and hearing impairments, I have relatively poor recollection of the original events.

3 I was never given the opportunity to properly testify due to discrimination by Defendant Megan Stiverson, who imposed a \$78,000 cash-only bail on me.

SEE ADDITONAL PAGES.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I ask for my toxicology reports from my stay in the jail to be given to me along with my healthcare providers, and the amount of \$3,000,000 in damages. For the crimes committed against me, violations of my rights and the damages they caused.

III. Statement of Claim Additional Page

Count #1 5th, 8th and 14th Amendment Violations

1 I experienced a medical emergency in public on April 20, 2023, four days after a abduction from my home.

2 Due to partial seizure-induced memory loss and associated vision and hearing impairments, I have relatively poor recollection of the original events.

3 I was never given the opportunity to properly testify due to discrimination by Defendant Megan Stiverson, who imposed a \$78,000 cash-only bail on me.

4 She made dictations on how I was held in jail, ordering my immediate placement in cell block 2B solitary confinement, attempting to declare me mentally incompetent while guards was cohesively pushing unwanted sedatives on me. I was completely denied phone privileges, both guards and inmates were instructed not to talk to me unless absolutely necessary.

5 I was recovering from and still partly experiencing symptoms including Partial seizures, fainting/blackouts, severe weakness, Vertigo, amnesia, nerve damage, muscle damage, muscle spasms, cramps and severe tremors similar to those associated with Parkinson's disease.

Count #2 8th Amendment Violations

6 When I was eventually moved to a different solitary confinement cell with less foot traffic, where despite my extreme protest and complaints, the water to my cell was shut off for Five days.

7 my water was only restored by me placing wet toilet paper over the cameras to draw attention.

Count #3 First and Sixth Amendment violations

8 As I understand they dropped most of the charges almost immediately, but held onto a resisting arrest charge as an excuse to keep me in jail despite the irregularity.

9 During this time, they were blocking me from talking to my attorney while subjecting me to cohesive Interrogation tactics mostly about my history of opioid use, specifically mentioning a rare opioid on my toxicology report.

10 After I firmly asserted to them that I was afraid of opioids and had no history of drug use, the guard seemed to acknowledge that this implicated the jail itself.

Count #5 HIPAA Violation

11 Following the dismissal of all charges, I was released directly from solitary confinement.

12 Since August 2024, I have been trying to gather information about what happened and obtain my HIPAA-protected medical records from the Hillsdale jail.

13 When I attempted to collect my medical records in person, they lied and used intimidation tactics to scare me away from returning to retrieve them.

14 I had left multiple voicemail messages at the jail medical infirmary department requesting my medical records, but they were ignored.

15 Finally on October 30, 2024, the necessary information for a medical record request was served to Defendant Jason Stiverson, on December 5, 2024, I sent a follow-up email stating that I still hadn't received my protected medical information, which constitutes a HIPAA violation.

16 Jason replied on the same day, December 5, 2024, stating that he "had the records and would mail them to me as soon as possible."

17 However, upon receiving the medical records on December 20, 2024, which was also the last date of contact, I realized that they had withheld my toxicology report.

18 I responded immediately to him but received no response about my toxicology report not being present in the envelope.

Count #6 HIPAA violation

19 Based on everything I know, two blood tests were done on me during my incarceration – once on April 27th, 2023, seven days after my arrest, and again three days later when they took a second sample to identify the rare opioid.

20 My brother Aaron Crist informed the police that he believed I might have been poisoned around April 20th 2023 because I have never acted that way before.

21 The act of withholding my toxicology report from the hospital staff during my May 2023 hospitalization in Indiana seems particularly concerning.

Count #7 Title 28 U.S.C. § 455 Violation

22 The police reaction appeared suspicious and abnormal.

23 But Judge Stiverson's behavior is inconsistent and seems biased when considering her marital relationship with Defendant Jason Stiverson it creates a pretty obvious conflict of interest, which likely contributed to the excessive bail amounts and irregularities in the handling of my case.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Mar 24, 2025

Signature of Plaintiff

Printed Name of Plaintiff

Austin Crist
Austin Crist

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address